

**UNITED STATES DISTRICT COURT****SOUTHERN DISTRICT OF TEXAS**

BROWNSVILLE DIVISION

**UNITED STATES OF AMERICA****V****CRIMINAL COMPLAINT****MARTINEZ SALOMON, JUAN ANTONIO**CASE NUMBER: 1:19-PO 004

A201 520 248

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 01/18/2019 in Cameron County, in the SOUTHERN District of TEXAS defendant, an alien did,

knowingly, willfully and in violation of law attempted to gain illegal entry into the United States by concealment of a material fact, and in furtherance of such violation presented a counterfeit United States Naturalization Certificate and declared to be a citizen of the United States,

in violation of Title 8 United States Code, Section(s) 1325 (a) (3).

I further state that I am a (n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to gain illegal entry into the United States through the Veterans International Bridge in Brownsville, Texas. The defendant presented a United States Naturalization Certificate bearing the name of Jose Salinas Salinas and further claimed to be said person to a U.S. Customs and Border Protection Officer. In secondary Customs and Border Protection Officers determined that the document presented by the defendant is counterfeit. Further, the defendant was determined to be a citizen and national of Mexico with no legal status to enter and or be in the United States.

Defendant had \$72.00 US Dollars.

Continued on the attached sheet and made a part hereof: Yes X No

/s/

**Rebecca Longoria CBPEO**

Signature of Complainant

Sworn to before me and subscribed in my presence,

January 20, 2019

Date

at

BROWNSVILLE, TEXAS

City and State

**IGNACIO TORTEYA III U.S. MAGISTRATE JUDGE**

Name &amp; Title of Judicial Officer

Signature of Judicial Officer